

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

G.T., by and through next friend	)	
LILIANA T. HANLON, <i>et al.</i> , individually	)	
and on behalf of all others similarly situated,	)	
	)	
Plaintiffs,	)	Case No. 1:21-cv-04976
v.	)	
	)	Hon. Nancy L. Maldonado
SAMSUNG ELECTRONICS AMERICA,	)	
INC., <i>et al.</i> ,	)	
	)	
Defendants.	)	

**PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY**

Plaintiffs respectfully notify this Court of the recent opinion in *Colombo v. Youtube, LLC*, No. 3:22-cv-06987-JD, 2023 U.S. Dist. LEXIS 111574 (N.D. Cal. June 28, 2023), a copy of which is attached as **Exhibit 1**. Plaintiffs submit this Notice and authority in support of *Plaintiffs' Response in Opposition to Defendants' Motion to Dismiss* (ECF No. 62).

*Colombo* is directly relevant to Plaintiffs' argument on Page 25 of 29 that alleging a scan of face geometry was involved adequately pleads a "biometric identifier" as defined by 735 ILCS 14/10 without additional allegations that the scan of face geometry identifies a particular individual or was actually used to do so. *See Colombo*, 2023 U.S. Dist. LEXIS 111574 at \*7 ("In YouTube's view, biometric identifiers must identify a person and biometric information must actually be used to identify a person. . . . The point is not well taken. BIPA defines 'biometric identifier' as 'a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry.' When a statute includes an explicit definition, we must follow that definition, even if it varies from a term's ordinary meaning.") (internal citations and certain quotation marks omitted).

Dated: June 30, 2023

Respectfully submitted,

G.T., BY AND THROUGH NEXT FRIEND LILIANA T. HANLON, SHIMERA JONES, LEROY JACOBS, BALARIE COSBY-STEELE, JOHN DEMATTEO, RICHARD MADAY, MARK HEIL, ALLISON THURMAN, AND SHERIE HARRIS, individually and on behalf of all others similarly situated, Plaintiffs

By: /s/ Theodore H. Kuyper

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***Attorneys for Plaintiffs and the Putative Class***

**CERTIFICATE OF SERVICE**

I hereby certify that, on June 30, 2023, I caused a copy of the foregoing ***Plaintiffs' Notice of Supplemental Authority*** to be served upon all counsel of record via electronic filing using the CM/ECF system.

/s/ Theodore H. Kuyper